

Attachment B

The Williams Companies, Inc.

June 7, 2002

Re: Docket No. PA02-2-000

Please refer to the Definitions, Procedures and Instructions in Attachment C. Unless otherwise stated below, these data requests concern the period January 1, 2000 to date.

1. From January 1, 2000 through the present, for Williams Companies, Inc., provide the following:
 - a. Energy Product Daily Profit and Loss Reports
 - (i) by location;
 - (ii) by trader;
 - (iii) by commodity/product;
 - b. Energy Product Daily Position Reports
 - (i) by location;
 - (ii) by trader;
 - (iii) by commodity/product.
2. For October 1, 2000 through February 28, 2001, provide transactional data for all financial and physical natural gas related products transacted by Williams that relate to delivery points at the southern California border and within southern California, including all Topock and Ehrenberg delivery points. Also, include all storage related transactions within southern California. For each transaction provided, identify:
 - a. price at which the transaction was executed;
 - b. volume or quantity;
 - c. product description;
 - d. counterparty;
 - e. whether Williams bought or sold;
 - f. transaction date;
 - g. delivery start and end date; and
 - h. all other terms necessary to accurately evaluate the transaction.

3. Identify each person employed at any time from October 1, 2000 through February 28, 2001 that designed, valued, marketed, executed, or hedged energy transactions or energy derivative transactions. For each person identified, state:
 - a. his/her job title and division or department title;
 - b. an organizational chart identifying the division and/or department;
 - c. street address and room number where he/she performed the above services;
 - d. where he/she currently works and his/her current telephone number(s);
 - e. whether he/she evaluated energy trades in the southern California locations or whether his/her work related to models utilized in southern California locations; and
 - f. length of time he/she worked in each department and organization described above.
4. State if Williams maintains or uses Management Guidelines, directives, statements of company policies with respect to trading and/or risk management of energy products, including, but not limited to, legal guidance, and suggested trading or risk management strategies. If yes, explain in detail and identify and provide all guidelines, directives, and statements of company policies applicable at any time since January 1, 2000. Provide each date when Management Guidelines changed and explain fully each change.
5. From January 1, 2000 through the present, identify and provide all communications, analysis, electronically prepared presentations, spreadsheets and all other work product that relate to energy trading strategies applied or applicable to the California energy markets including California border gas markets.
6. From January 1, 2000 through the present, identify and provide all communications, analysis, electronically prepared presentations, spreadsheets and all other work product created, received or delivered by Williams natural gas traders, analysts and risk control personnel who worked on or were responsible for southern California and southern California border gas transactions or markets.
7. Did Williams participate in or make a market in the NO_x RECLAIM market in Southern California? If yes, provide each transaction entered into including, but not limited to, purchases, sales, and any related derivative transaction. For each transaction, specify the date purchased, the amount purchased, the counter-party and the date each position was sold or expired.

Attachment C

The Williams Companies, Inc.

June 7, 2002

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DEFINITIONS

1. "Williams" means The Williams Companies, Inc. and any of its affiliates, subsidiaries, directors, divisions, groups, offices, branches, departments, as well as its employees, agents, contractors, consultants, attorneys, predecessors or successors, wherever they may be situated, and all other persons who have an interest in Williams, its subsidiaries, affiliates, divisions, joint ventures, including, but not limited to Williams or any other legal entity in which Williams has an interest.
2. "Daily Profit and Loss Reports" refer to internal daily reports that summarize profits and losses arising out of Energy Transactions.
3. "Daily Position Reports" refer to internal daily reports that summarize Energy Product hedging and speculative positions taken and include, but are not limited to, position summaries, "Value at Risk" statistics and Delta, Gamma, Vega risk statistic information.
4. "Management Guidelines" include any documents, directive(s), manuals, internal policies or guidelines limiting employees authority to execute transactions related to hedging and/or speculation of energy commodity and transmission related risks.
5. "Energy Product" or "Energy Transaction" means any wholesale electricity and wholesale natural gas product, including but not limited to commodity and transmission related products, intended either for physical delivery or traded as financial products.
6. "RECLAIM" means Regional Clean Air Initiatives Market program operated by the South Coast Air Quality Management District.
7. (a) "Documents" refers to the originals of all writings and records of every type in your possession, control, or custody, including but not limited to:

testimony and exhibits, memoranda, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), summaries, comparisons, tabulations, charts, books, pamphlets, photograph forms (including microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, and photocopies), maps, sheets, ledgers, transcripts, vouchers, accounting statements, budgets, workpapers, engineering diagrams (including "line" diagrams), communications, speeches, and all other records, written, electronic (including information on electronic or magnetic storage devices), mechanical, or otherwise, and drafts, attachments or appendices of any of the above.

- (b) "Documents" includes copies of documents, where the originals are not in your possession, custody, or control.
 - (c) "Documents" includes every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copies.
 - (d) "Documents" includes electronic data and records stored on computer equipment, including electronic devices which are capable of collecting, analyzing, creating, displaying, converting, storing, concealing or transmitting electronic, magnetic, optical, or similar computer impulses or data. These devices include but are not limited to any data-processing hardware (such as central processing units, hard disks, memory typewriters, and self-contained "laptop" or "notebook" computers); internal and peripheral storage devices (such as fixed disks, external hard disks, floppy disk drives and diskettes, tape drives and tapes, optical storage devices, CD-ROMs, printer buffers, Bernoulli drives, smart cards, memory calculators and other memory storage devices); peripheral input/output devices (such as printers and scanners); and related communications devices (such as modems, recording equipment, and RAM or ROM units).
8. "Communication(s)" includes all verbal and written communications of every kind, including, but not limited to, telephone calls, conferences, electronic mail and correspondence, and all documents and memoranda concerning the communication.
9. (a) "Identification" and "identify" when used with respect to a document, includes (but is not limited to) stating the nature of the document (e.g., letter, memorandum, corporate minutes); the date, if known, on which the

document was prepared; the title of the document; the general subject matter of the document; the number of pages in the document; the identity of each person who wrote, dictated, or otherwise participated in the preparation of the document; the identity of each person to whom the document was addressed; the location of the document; and the identity of the person having possession, custody, or control of the document. Identification of a document includes identifying all documents known or believed to exist whether or not they are in your custody.

- (b) "Identification" and "identify" when used with respect to a natural person, includes, unless otherwise indicated, stating (i) his or her full name, (ii) his or her present title and position, (iii) his or her current daytime telephone number and address, and (iv) his or her present and prior connections or association with, the company in question.
 - (c) "Identification" and "identify" when used with respect to an electronic document or data, includes (but is not limited to) stating the computer software and computer related documentation used to create the document or data and the identity of the person(s) in charge of collecting, processing, programming (if any) and analyzing the electronic document or data.
 - (i) "Computer software" is described as any and all information, including any instructions, programs, or program code, stored in the form of electronic, magnetic, optical, or other media which are capable of being interpreted by a computer or its related components. Computer software may also include certain data, data fragments or control characters integral to the operation of computer software. These items include but are not limited to operating system software and applications software used or intended for use to communicate with computer components.
 - (ii) "Computer-related documentation" is described as any written, recorded, printed or electronically stored material which explains or illustrates the configuration or use of any hardware, software or any related item.
10. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, cooperative, municipality, commission, governmental body or agency, or any other group or other organization.
11. "Each," "any," and "all" mean "each and every."

12. "You" and "your" means Williams and any of its directors, officers, employees, agents, contractors, consultants, attorneys, and any other person acting or purporting to act on its behalf.
13. "Relating to" means in whole or in part constituting, containing, concerning, embodying, reflecting, describing, analyzing, identifying, stating, referring to, dealing with, or in any way pertaining to.
14. "Chart" means a pictorial representation of information.
15. "IT" means computer support.

PROCEDURES AND INSTRUCTIONS

1. The responses to the Questions must be accompanied by a sworn affidavit from an authorized officer or agent in which such officer or agent certifies that the information and documents provided constitute a response that is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry to all questions.
2. Where a question has a number of separate subdivisions or portions, a complete response is required for each such subdivision or portion.
3. Unless otherwise directed, provide all responses in chronological order.
4. Where a question is directed to Williams and a Williams subsidiary or other contractor actually acts on behalf of Williams or provides any support or technical service relevant to the question, Williams must respond to the question, obtain the information from the other entity, and indicate the name of the party providing the services.
5. Each document of more than one page should be stapled or otherwise bound. Documents provided require consecutive document control numbers.
6. The terms "and" and "or" should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each question any information or document that might otherwise be considered to be beyond its scope.

7. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, in order to bring within the scope of each question any information or document which might otherwise be considered to be beyond its scope.
8. If a question specifically requests an answer in response rather than the production of documents, an answer is required. The production of documents in lieu of an answer will not suffice.
9. If no document is responsive to a question which calls for a document, then so state. In each such instance the question should be treated as a question requiring a written response.
10. Each question to "provide all documents," or similar phrases, includes a request to "identify" all such documents. To the extent that a document is self-identifying, it need not be separately identified.
11. If a question can be answered in whole or in part by reference to the response to another question, it is sufficient to so indicate by specifying the other question, by specifying the parts of the other response that are responsive, and by specifying whether the response to the other question is a full or partial response to the instant question. If it constitutes a partial response, the balance of the instant question must be answered.
12. If you cannot answer a question in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the question in full, and state what information or knowledge you have concerning the unanswered portions.
13. If any document responsive to any question has been discarded, destroyed, or is unavailable, state when, and explain why, such document was destroyed, discarded, or is unavailable and identify the person directing the destruction or discarding; and provide all documents relating to and a narrative description of any company criteria or procedures under which such document was discarded, destroyed, or is unavailable. If the document or copies are still in existence, identify each such document by listing its author and address, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, present location and custodian.
14. (a) If any document, communication or information elicited by this request is withheld by reason of a claim of privilege or any other reason, state the

basis for such withholding and provide the following information with respect to each document, communication or piece of information withheld:

- (i) Identify the document, communication or information;
 - (ii) Indicate the date of the document, communication or information.
- (b) If the attorney-client privilege is claimed:
- (i) Identify the attorney and client involved (if the client is not a natural person, identify the person(s) sending or receiving each document, communication or piece of information on behalf of the client);
 - (ii) Indicate whether the communication claimed to be privileged was made by the attorney or by the client;
 - (iii) Indicate who was present when the communication was made, and, if a document is involved, where and how it is filed within the attorney's and client's offices;
 - (iv) Indicate whether the document or information has been communicated to any person other than the attorney and client involved (if yes, identify such third person by name and relationship to the client and the attorney, and indicate the date of such communication);
 - (v) If the privileged portion of the document or information is capable of being excised, so that the remainder is no longer privileged, then produce the non-privileged portion(s) of the document or information;
 - (vi) Indicate whether a retainer agreement between the client existed at the time of the communication, and if yes, the date of such agreement; and
 - (vii) Indicate the period of time during which the attorney-client relationship existed.
15. Identify the person(s) responsible (whether directly or indirectly) for preparing and providing each response. In addition, identify the person(s) from whom the information or documents were obtained and the files searched.

16. These questions are continuing in nature and require production of all documents and information written or obtained by Williams up to the time of the company's final response to these questions.
17. Information is requested for calendar years. If calendar year information is not available, supply fiscal year data indicating the 12-month period covered.
18. If, in answering any of these questions, any question, definition, or instruction is unclear or ambiguous, immediately contact the undersigned attorney for a clarification.